

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

ADELA BAI, on behalf of itself and all others similarly situated	)	No. 1:16-cv-00102
	)	
	)	<u>CLASS ACTION</u>
Plaintiffs,	)	
	)	
vs.	)	
	)	Judge Donald C. Nugent
TCP INTERNATIONAL HOLDINGS LTD.,	)	
KAREL ROBERT DEN DAAS, ELLIS YAN,	)	<b>MOTION FOR ADMISSION OF</b>
and BRIAN CATLETT,	)	<b>CHARLES F. SMITH <i>PRO HAC VICE</i>.</b>
	)	
Defendants.	)	
	)	
	)	
_____	)	

Pursuant to Local Rule 85.3(h) and the attached affidavit, Daniel R. Warren, attorney for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett, moves this Court to admit Charles F. Smith *pro hac vice* to appear and participate as counsel in this case for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett.

Mr. Smith is a member in good standing of the highest court of the State of Illinois, effective November 5, 1987. Mr. Smith is also a member in good standing of the bars of the Supreme Court of the United States, the United States Courts of Appeals for the Sixth, Seventh, Tenth, and Eleventh Circuits, and the United States District Court for the Northern District of Illinois. Mr. Smith has never been disbarred or suspended from the practice of law or received any reprimand from any court pertaining to conduct or fitness as a member of the bar. Attached as Exhibit A is a sworn affidavit attesting to Mr. Smith's good standing.

The required admission fee of \$120 is being paid via credit card. Mr. Smith will register for electronic filing with this Court upon the granting of this Motion.

Mr. Smith's relevant identifying information is as follows:

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Dated: January 22, 2016

Respectfully submitted,

/s/ Daniel R. Warren  
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*Counsel for Defendants TCP  
International Ltd., Karel Robert den  
Daas, and Brian Catlett*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of January, 2016, a copy of the foregoing filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel R. Warren

Attorney for Defendants TCP  
International Holdings Ltd.,  
Karel Robert den Daas, and  
Brian Catlett